

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ROLANDO A ALBARRACIN
ZULMA GOMEZ RIVERA

DEBTOR(S)

CASE NUMBER: 11-02119 ESL

CHAPTER 13

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to adjust debtors payment schedule and eliminate provision from garnish funds and assume lease with First Leasing.

WHEREFORE, it is respectfully requested to this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 4th day of June of 2011.

JPC LAW OFFICE

Jose M Prieto Carballo, Esq
P.O. Box 363565
San Juan, P.R. 00936-3565
Tel (787) 607-2066 & Tel (787) 607-2166
jpc@jpclawpr.com

By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. 11-02119-13

ALBARRACIN, ROLANDO A & GOMEZ RIVERA, ZULMA

Debtor(s)

Chapter 13

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

<p>PLAN DATED: _____</p> <p><input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION</p>	<p><input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>6/04/2011</u></p> <p>Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other</p>																																				
<p>I. PAYMENT PLAN SCHEDULE</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">\$</td> <td style="width: 15%;">1,200.00</td> <td style="width: 15%;">x</td> <td style="width: 15%;">2</td> <td style="width: 15%;">= \$</td> <td style="width: 15%;">2,400.00</td> </tr> <tr> <td>\$</td> <td>725.00</td> <td>x</td> <td>25</td> <td>= \$</td> <td>18,125.00</td> </tr> <tr> <td>\$</td> <td>1,200.00</td> <td>x</td> <td>33</td> <td>= \$</td> <td>39,600.00</td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> <tr> <td colspan="6" style="text-align: center;">TOTAL: \$ <u>60,125.00</u></td> </tr> </table> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: _____</p> <p><input type="checkbox"/> Sale of Property identified as follows: _____ _____</p> <p><input type="checkbox"/> Other: _____ _____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>60,125.00</u></p> <p>III. ATTORNEY'S FEES (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,634.00</u></p> <p>Signed: <u>/s/ ROLANDO A ALBARRACIN</u> Debtor</p> <p><u>/s/ ZULMA GOMEZ RIVERA</u> Joint Debtor</p>		\$	1,200.00	x	2	= \$	2,400.00	\$	725.00	x	25	= \$	18,125.00	\$	1,200.00	x	33	= \$	39,600.00	\$		x		= \$		\$		x		= \$		TOTAL: \$ <u>60,125.00</u>					
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TOTAL: \$ <u>60,125.00</u>																																					
<p>II. DISBURSEMENT SCHEDULE</p> <p>A. ADEQUATE PROTECTION PAYMENTS OR \$ _____</p> <p>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. BPPR Cr. SCOTIABANK Cr. _____ # 71010014564390 # 0001333309 # \$ 1,000.00 \$ 100.00 \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: _____ 5. <input type="checkbox"/> Other: _____ 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: BPPR SCOTIABANK <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5).</p> <p>ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330.</p>																																					

Debtor(s)

CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 1**Executory Contracts - Assumed:**

FIRST BANK PUERTO RIC

Cr

#

\$

Label Matrix for local noticing

0104-3

Case 11-02119-ESL13

District of Puerto Rico

Old San Juan

Sat Jun 4 12:49:41 AST 2011

US Bankruptcy Court District of P.R.

U.S. Post Office and Courthouse Building

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

SCOTIABANK PR
CARDONA-JIMENEZ LAW OFFICE PSC
PO BOX 9023593
SAN JUAN, PR 00902-3593

eCAST Settlement Corporation

POB 29262

New York, NY 10087-9262

Att Wireless
Po Box 192830
San Juan, PR 00919-2830

B-Line, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

BANCO POPULAR DE PUERTO RICO

BANKRUPTCY DEPARTMENT

PO BOX 366818

SAN JUAN PR 00936-6818

BPPR
PO BOX 366818
San Juan, PR 00936-6818

Bank Of America
Po Box 17054
Wilmington, DE 19850-7054

Citifinancial Plus

Bsp13a

Baltimore, MD 21202

DEPARTAMENTO DE HACIENDA
PO BOX 9024140
SAN JUAN, PR 00902-4140

FIA Card Services, NA as successor in intere
Bank of America NA and MBNA America Bank
1000 Samoset Drive
DE5-023-03-03
Newark, DE 19713-6000

FIRST BANK

BANKRUPTCY DIVISION

PO BOX 9146

SAN JUAN PR 00908-0146

First Federal Savings
Auto Leasing
San Juan, PR 00908

Fst Revenue
4500 Cherry Creek Dr Ste
Denver, CO 80246-1518

Gemb/walmart

Po Box 981400

El Paso, TX 79998-1400

Lvnv Funding
Po Box 740281
Houston, TX 77274-0281

RG PREMIER BANK NOW SCOTIABANK DE PUERTO RIC
ISMAEL H. HERRERO III
P O BOX 362159
SAN JUAN PR 00936-2159

Rg Premier Bank

Po Box 2510

Guaynabo, PR 00970-2510

SCOTIABANK
PO BOX 362649
SAN JUAN, PR 00936-2649

SCOTIABANK DE PUERTO RICO
CARDONA-JIMENEZ LAW OFFICE, PSC
P.O. BOX 9023593
SAN JUAN, PR 00902-3593

SEARS

PO BOX6241

SIOUX FALLS, SD 57117-6241

ALEJANDRO OLIVERAS RIVERA
ALEJANDRO OLIVERAS, CHAPTER 13 TRUS
PO BOX 9024062
SAN JUAN, PR 00902-4062

JOSE M PRIETO CARBALLO
JPC LAW OFFICE
PO BOX 363565
SAN JUAN, PR 00936-3565

MONSITA LECAROZ ARRIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901-1938

ROLANDO A ALBARRACIN
PO BOX 5297
CAGUAS, PR 00726-5297

ZULMA GOMEZ RIVERA
PO BOX 5297
CAGUAS, PR 00726-5297

(u)First Leasing & Rental Corporation

(d)eCAST Settlement Corporation
POB 29262
New York NY 10087-9262

End of Label Matrix	
Mailable recipients	26
Bypassed recipients	2
Total	28